



NORTHERN & SHELL

IPSO

SECOND ANNUAL REPORT

1 JANUARY 2015 – 31 DECEMBER 2015

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THE NORTHERN & SHELL NETWORK OF COMPANIES

Richard Desmond founded the Northern & Shell network of companies in 1974 as a music magazine publisher. It has experienced almost four decades of expansion and has now become a significant force in British and worldwide media, with a portfolio including newspapers and magazines.

Northern & Shell launched OK! Magazine in 1993, acquired Express Newspapers in November 2000 and The Health Lottery in February 2011. Express Newspapers is a 50% joint venture partner in the Irish Daily Star.

Northern & Shell also has diverse interests in investment and property.

NORTHERN & SHELL PLC



Northern & Shell Plc is the publisher of OK! Magazine and Star Magazine.

NORTHERN & SHELL MAGAZINES LIMITED



Northern & Shell Magazines Limited is the publisher of new! Magazine.

OK!, new! and Star are weekly magazines that feature celebrity interviews and shoots, news stories, health features, celebrity columns and fashion pages.

EXPRESS NEWSPAPERS



DAILY EXPRESS SUNDAY EXPRESS

Express Newspapers is wholly owned by Northern & Shell Network Ltd and publishes the Daily Star, Daily Star Sunday, Daily Express and Sunday Express and all their Scottish editions.

NORTHERN & SHELL DIGITAL LIMITED



Northern & Shell Digital Limited is the publisher of the websites associated with each title.

A full list of all publications and their circulation and viewing figures can be found in **Appendix A**.

EDITORIAL STANDARDS

All editors share similar editorial standards. Whilst each publication has separate editorial teams, those teams apply the same standards across the range of titles.

Editorial standards are enforced by a combination of the Editorial Director, each Editor and Deputy Editor and by the Managing Editor's office. Editors are assisted by the Editorial Legal Department and by the Group Legal Department.

Every issue of every newspaper and magazine is read either by the Editorial Legal Department or Group Legal Department. The Editorial Legal Department is responsible for the publications of Express Newspapers and Northern & Shell Digital. The Group Legal Department is responsible for the publications of OK!, new! and Star.

By way of education, training and continuing workplace discussion, all editorial staff are directed to operate in line with the current legal framework governing our industry and the Editors' Code of Practice. We have updated our Bribery Policy and our Social Media Policy, both of which are annexed to this report at **Appendix B**.

There are daily and weekly editorial meetings, depending on the publication, in which any issues can be aired fully.

There is regular consultation with the legal department throughout the day, and week, providing immediate pre-publication advice and advice on current and future investigations and proposed items for future publication.

If there are any questions or doubts about the suitability of a story or picture, editorial staff will always refer to their line manager. If doubt continues, then the line managers will always seek legal advice.

Editorial staff are made aware of the legal implications of their work and are encouraged to voice any concerns about stories and pictures they may have to senior colleagues and/or the Editorial Legal Department.

News and picture departments are expected to communicate regularly with senior editors and production departments to make sure that the respective departments are aware of the progress of a story and any checks being done on the veracity of a source.

Interviews are recorded and preserved wherever possible. Journalists are expected to behave in accordance with the Editors' Code of Practice when conducting interviews.

Agents, representatives, legal representatives and individuals are approached for comment wherever practicable. Our staff are always mindful of the governing legal framework surrounding such conduct. We make every effort to

ensure that we do not cause any distress when making such approaches. Our journalists make every effort to verify their stories.

When using photographs from outside sources, either individuals or agencies, we make every effort to contact the agency or photographer to ensure that the photographs have been taken in accordance with the Editors' Code of Practice.

During the period covered by this second annual report Northern & Shell did not seek pre-publication guidance from IPSO.

COMPLAINTS HANDLING PROCESS

Editorial complaints alleging breaches of the Editors' Code of Practice for all print and digital titles across the Northern & Shell network of companies are dealt with by the Editorial Legal Department and the Group Legal Department, with the exception of one or two addressed to the Editors personally and received by mail.

Nicole Patterson is the Responsible Person for Northern & Shell.

The vast majority of editorial complaints come through either our online complaints form, by letter or through IPSO itself. Our form is accessible through our website and complainants are directed to two separate forms, one for grammatical and other errors and one for articles which the complainant believes have been a breach of the Editors' Code of Practice. Links to the various forms and policies can be found here <http://www.express.co.uk/complaints-policy> and copies are attached at **Appendix C**.

All of our publications contain our IPSO statement, a short guide to making digital or paper complaints and instructions on where to find our website address and copy of the Editors' Code of Practice.

Once a complaint is received it is acknowledged as soon as practicably possible and the article removed, if necessary. If the article is to be removed, a legal warning will be sent to all staff and a copy of the warning is placed on our digital library, visible to all staff.

The Editorial Legal Department corresponds with the complainant and, with the help of the editorial team, an attempt is made to reach a mutual settlement. The teams offer a wide range of settlement proposals from the amendment or permanent removal of an online article, to the publication of corrections or apologies.

Corrections and apologies are placed on the same page for each title, unless directed differently by IPSO.

For our hard copy newspaper titles, IPSO complaints are always placed on our Letters or Forum page with the exception of the Daily Star Sunday which is on page 2.

For our hard copy magazine titles, corrections and apologies are placed on the letters page.

For our digital titles, a short nib of the correction or apology will be placed on the homepage with a direction or link to the full page. If a digital article is amended, the reader of the page is usually notified of the amendment at the beginning or conclusion of the article.

TRAINING PROCESS

During 2015 the whole editorial team was offered training in “writing for digital media” which took place in London and Broughton between June and September and was delivered to 160 People by Content Etc.

From July 1st the editorial team was enrolled in an e-learning programme with Eliesha Training Limited targeted at our IPSO responsibilities, and we follow the online modular course provided by the Press Association.

13 managers within the editorial teams embarked on an in-house management training programme which began in 2015.

Senior digital editorial managers attended a three part external training course, two parts of which fell in November and December 2015.

Individual members of the Legal Departments all regularly attend outside training for the Continuing Professional Development requirements of their individual governing bodies, together with other seminars and workshops as and when they are available.

A copy of the Editors’ Code of Practice sits on all News, Features and Picture Desks and is available on our internal HR page. A list of training materials is available on our internal HR server.

RECORD ON COMPLIANCE

Our record on compliance is excellent. A full list of complaints received is at **Appendix D**.

DIRECT COMPLAINTS

In the relevant period our print and digital newspapers received 46 complaints through our website complaints form.

In the relevant period our print and digital newspapers received no complaint by direct mail.

Of these 46 articles, 17 of them were found not to be breaches of the Editors' Code of Practice and the remainder were resolved by the removal of the article or an amendment made to it.

The Scottish Daily Express received 1 complaint, which was resolved by the publication of a correction.

OK! magazine received 2 complaints directly from readers alleging a breach of the Editors' Code of Practice. The complaints were resolved by the removal of the article or an amendment made to it.

New! magazine received 2 complaints directly from readers alleging a breach of the Editors' Code of Practice. The complaints were resolved by the removal of the article or an amendment made to it.

There have been no complaints on Star Magazine.

IPSO COMPLAINTS

In the relevant period our magazines received no complaints.

Our print and digital newspapers, including the Scottish Daily Express, received 39 complaints. Of these complaints, 2 were withdrawn, 30 were not upheld or were not considered by the Committee, 3 were upheld but sufficient remedial action had already been taken, 1 required the publication of a correction to the online article and 3 resulted in the publication of an adjudication.

Our response to adverse adjudications is to discuss the process at length with editors and journalists involved and circulate the adjudication to relevant staff.

APPENDIX

APPENDIX A

NORTHERN & SHELL PLC

OK! – Editor Kirsty Tyler

Average weekly circulation for the period 1 September 2014 to 31 December 2014 was 258,000.

Star Magazine – Editor in Chief Lebby Eyres

Average weekly circulation for the period 1 September 2014 to 31 December 2014 was 168,000.

NORTHERN & SHELL MAGAZINES LIMITED

new! Magazine – Editor in Chief Lebby Eyres

Average weekly circulation for the period 1 September 2014 to 31 December 2014 was 270,000.

EXPRESS NEWSPAPERS

Daily Express – Editor Hugh Whittow

Average daily circulation for the period 1 January 2015 to 31 December 2015 was 428,000 copies.

Sunday Express – Editor Martin Townsend

Average circulation for the period 1 January 2015 to 31 December 2015 was 375,000 copies.

Daily Star – Editor Dawn Neesom

Average daily circulation for the period 1 January 2015 to 31 December 2015 was 368,000 copies.

Daily Star Sunday – Editor Stuart James

Average circulation for the period 1 January 2015 to 31 December 2014 was 265,000 copies

NORTHERN & SHELL DIGITAL LIMITED

Group Director of Digital Content - Geoff Marsh

dailyexpress.co.uk

Approximate average monthly viewing figures for the period 1 January 2015 to 31 December 2015 was 18,200,000.

dailystar.co.uk

Approximate average weekly viewing figures for the period 1 January 2015 to 31 December 2015 was 9,200,000.

ok.co.uk

Approximate average weekly viewing figures for the period 1 January 2015 to 31 December 2015 was 3,400,000.

star-magazine.co.uk

Approximate average weekly viewing figures for the period 1 January 2015 to 31 December 2015 was 22,000.

new-magazine.co.uk

Approximate average weekly viewing figures for the period 1 January 2015 to 31 December 2015 was 82,000.

APPENDIX B

Social Media Policy
Bribery Act Policy

Social Media

This policy applies to all employees, casuals and freelancers employed by Northern & Shell Plc, Express Newspapers, The Health Lottery and Portland TV ("the Company"). It also applies to all forms of social media: Twitter, Facebook, Google +, blogging etc.

The Company encourages the use of social media as an effective way of promoting your work and the Company's publications and business activities. However, the use of social media exposes you and the Company to the risk of legal action for example, defamation, breach of privacy or contempt of court. The objective of this policy is to make you aware of your responsibilities when using social media, either personally or on behalf of the Company, so that you can use it safely.

This policy will affect those within the corporate business of the Company in different ways for example, a journalist with OK! or Express Newspapers, as opposed to an employee who works solely in the accounts or sales department. Everyone needs to read this policy carefully.

This policy not only encompasses social media sites such as Twitter, Facebook, Tumblr, Pinterest and Instagram but also the comments sections of the websites of publications of the Company, for example OK!, Daily Star and Daily Express.

Any web-based social media account, either personal or work related, that contains any reference to the Company and/or its related publications is subject to this policy.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

This policy covers the following:

- o Personal and Branded Accounts
- o Opinions
- o Friending/following
- o Showcasing work on blogs and social networks
- o Privacy
- o Sourcing
- o Bribery Act
- o Journalists – Applicable Law
- o Monitoring
- o Breaching this policy

PERSONAL ACCOUNTS

Social media has become an essential tool for journalists to gather news and share links to published work. If your personal account has links and/or any connection to the Company then that account is bound by this policy.

- You must always use your real name and be clear about who you are and who you work for.
- You must not use the Company's logos without express permission from your editor or line manager.
- If you are using your personal accounts for work, you must seek express permission from your editor or line manager to do so and you must identify yourself in your profile as being from your respective publication.
- You must have the permission of your editor or line manager to include a specific publication in your Twitter or other usernames, ie. @maryOK! or to reference your publication and/or job title in the info field.
- You must always use a disclaimer "all views expressed are my own and not those of my employer". (Please note that the Company can still be held vicariously liable for what you write even with a disclaimer so you still need to be careful).
- If you have a personal account and a work account you must differentiate between the two. For example, your work Twitter account could say: "I am News Editor on the Daily Express. All views expressed are my own and not those of my employer." and your personal account could say: "This is my personal account. Head to @[name] for Daily Express related tweets".

BRANDED AND PERSONAL ACCOUNTS

If you are working on a branded account, for example @Daily_Star, or a personal account:

- You must not share confidential or commercially sensitive information about the Company or its partners, in breach of the confidentiality clause in your contract of employment. If you are unsure whether certain information has been publicly released, speak to your editor, line manager or the legal department.
- You must write respectfully about the Company, its employees, partners and competitors.
- You must be mindful of competitive and corporate issues as you post links.
- You must not engage in activities or discussions which could bring the Company into disrepute or adversely affect any of the Company's relationships eg. with an advertiser.
- You must not write derogatory comments or defame another person or company. Remember that the Company may well be

liable even if you are repeating comments made by someone else.

- You must not post or reproduce a substantial part of someone else's work without their permission, even if that work is freely available. This includes photographs. You will be infringing their copyright if you do so. If you do want to reproduce somebody else's work in its entirety, please do so by hyperlink. If in doubt, always consult the legal department.
- Check that you understand how the social media platform that you are using works. Do not confuse the direct messaging 'DM' function with a 'reply' – effectively publishing to all.
- Do not write or post anything which is abusive or could amount to harassment or bullying or breach the Company's Bullying and Anti-Harassment Policy.
- Do not post inappropriate or offensive material.

OPINIONS

All employees must be aware that the opinions they express may damage the Company's reputation as a source of news. Employees often ask if they are free to comment in social media on matters like sports and entertainment. The answer is yes, but there are some important things to keep in mind:

- Trash-talking about anyone (including a team, company or celebrity) reflects badly on the Company.
- Assume your post/tweet/comment will be seen by the target of your comment. The person or organisation you are deriding may be one that the Company is trying to develop as a partner.
- Think before you respond to someone being provocative – it is very easy to become engaged in a slanging match. Do not engage in bad language or name-calling.

Re-tweeting

- If you re-tweet someone else's tweet, make sure that it is clear that this is a re-tweet. Similarly with Instagram, if you regram, make sure that you say so.
- Re-tweeting can be seen as endorsement of the original tweet. However, you can re-tweet opinionated material if you make clear you are simply reporting it, much as you would quote it in a story. Introductory words help make the distinction.
- These cautions apply even if you say on your Twitter profile that re-tweets do not constitute endorsements. Many people who

see your tweets and re-tweets will never look at your Twitter bio.

- Journalists should avoid re-tweeting rumours and hearsay. However, you may reply to such tweets in order to seek further information, as long as you are careful to avoid repeating the questionable reports.
- Employees are welcome to re-tweet and share material posted by official Company branded accounts on social networking sites (eg. Facebook or Google + page).

FRIENDING/FOLLOWING

- The Company is in favour of engaging with those who consume its content. Journalists should feel free to ask their followers on social networks for their opinions on news stories, or to put out a call for witnesses and other sources, including people who have captured photos or video that we might want to authenticate and use.
- Journalists are also encouraged to answer questions about their areas of coverage that are directed their way on social media, as long as they answer in a way that is not abusive, insulting and in breach of your terms of employment.
- Most feedback we receive is constructive, and any substantive criticism of the Company's publications' content should be taken seriously, however it may be phrased.
- However, it is best to avoid protracted back-and-forth exchanges with angry people that become less constructive with each new round. Abusive, bigoted, obscene and/or racist comments should be flagged to allow the legal department to deal with those individuals.
- Any response you make to a reader or viewer could go public. Email, Facebook messages and Twitter direct messages may feel like private communications, but may easily find their way to blogs and political pressure groups, lawyers and others.
- Any incoming message that raises the possibility of legal action **must** be reviewed by the relevant legal department before a response is made.
- **Posting comments on our Articles**

When a journalist writes an article and it is uploaded to one of our websites the usual policy is for our readership to be able to post comments regarding the story. In the spirit of debate, a journalist who wrote the article is free to post comments and debate with our readership. However other employees are discouraged from commenting on other peoples' articles published on the websites of the Company's publications (e.g OK!, Daily Star and Daily Express).

Regulations governing comments on websites came into effect on 01 January 2014. A website operator would **not** be able to defend a libel case **if** a claimant can show that the person who posted a libellous comment (on OK! for example) was an employee of the Company.

The comments sections of our websites are interactions for the public, not for employees to post observations among themselves in a public-facing forum.

Any journalist who does wish to post comments on their article should abide by both the clauses and spirit of this social media policy.

Deleting Tweets

- Deletion only removes the tweet from Twitter.com and perhaps some other Twitter clients. Tweets that have been re-tweeted or reposted elsewhere will still remain publicly visible. If you believe a tweet should be deleted, contact your line manager, editor or legal department to discuss the situation.

Corrections

- Erroneous tweets or other social media posts need to be corrected quickly and transparently. This applies to messages or posts on personal accounts as well as branded accounts. Serious errors need to be brought to the attention of your editor, line manager or legal department.

SHOWCASING WORK: BLOGS & SOCIAL NETWORKS

Journalists are encouraged to share work on their personal websites and blogs. Journalists may post a sampling of their text stories, photos, videos or inter-actives once they have been published by the Company as long as you comply with the following:-

- The material must be clearly identified as content from the relevant publication.
- When sharing your work, you must link to the content rather than uploading it directly.
- You must remember to take the material down following any legal warning.
- The Company must have the opportunity to publish exclusive text, photo and video material before it appears on social networks. Once that material has been published, you may tweet and post a link to it on social media platforms provided that you have permission from your line manager.

- Incremental reporting threads: journalists should never share on social networks details that, if closely held, could lead to important, exclusive content being disclosed.
- Non-work related content created by the Company's employees, such as personal photos, videos and writings, should only be shared on personal websites, blogs and social networks. All postings must be consistent with the terms and conditions of your contract of employment and with this policy.

PRIVACY

- When using your own personal Facebook account or similar personal account remember that your "friends" will see whatever you have posted. Remember also that even if you restrict your privacy settings there is always a possibility of something being made public.
- You must not post on social networks any information that could jeopardise the safety of the Company's staff.
- You must not breach the Company's Data Protection Policy (for example, never disclose personal information about a colleague on-line).
- You must be respectful towards your colleagues and not do anything on social media which could infringe their privacy or cause them embarrassment. Ask their permission before writing about them.
- You must not publish photographs where the subjects have a reasonable expectation of privacy. If you are unsure, speak to the legal department.
- You may become privy to personal information relating to events, stories, criminal cases and celebrities etc not in the public domain. You must always act with extreme care when contemplating placing such personal information on a social media site.
- You should customise your privacy settings on social media sites to determine what you share and with whom. It is easy for someone to copy material out of restricted pages and redirect it elsewhere for wider viewing.

SOURCING

It can be difficult to verify the identity of sources found on social networks. Sources discovered there should be vetted in the same way as those found by any other means. For example:

- If a source you encounter on a social network claims to be an official source from a company, organisation or government agency, call the place of business to confirm the identity, just as you would if a source called on the phone.

- Most social media sites offer a way to send a message to a user; use this to establish direct contact, over email or by phone, so you can get more detailed information about the source. Always make every effort to make contact.
- Use particular caution if you find a social networking account that appears to belong to a person who is central to a story, especially if you are unable to get confirmation from that person. Fake accounts are rampant in the social media world and can appear online within minutes of a new name appearing in the news. Examine the details to determine whether the page could have just as easily been created by somebody else.
- Many athletes, celebrities and politicians have verified Twitter accounts, identified by a white-on-blue check mark on the profile page, which means Twitter has determined that the account really does belong to that person. However, Twitter's verification process has been fooled, meaning you should still do your own checking. The same goes for verified Google + pages, which have a check mark — you still need to verify the page yourself.
- Before you quote from somebody's tweets or posts, confirm who is managing the account. Is it the famous person? His or her handlers? A combination? Knowing the source of the information will help you determine just how newsworthy the tweet or post is and how to characterise it.
- To include photos, videos or other multimedia content from social networks in a news report, you must determine who controls the copyright to the material and get permission from that person or organisation to use it. Any exceptions must be discussed with your editor and relevant legal department. The authenticity of the content also needs to be verified.
- Journalists should take a sensitive and thoughtful approach when using social networks to pursue information or user-generated content from people in dangerous situations or from those who have suffered a significant personal loss. They should never ask members of the public to put themselves in danger, and in fact should remind them to stay safe when conditions are hazardous. Reporters should use their journalistic instincts to determine whether inquiring through social media is appropriate at all given the source's difficult circumstances, and should consult with their editor in making this decision.

BRIBERY ACT

No employee of the Company should seek to use their position to obtain services or gifts. For example 'Tommy' from the sales team uses his email address with a suffix of Express or OK! to obtain goods and services with the promise of free publicity. To do so would constitute not just a breach of your contract of employment but also an offence under the Bribery Act 2010.

JOURNALISTS – APPLICABLE LAW

In addition to the above you must always follow the Editor's Code of Practice http://www.editorscode.org.uk/the_code.html and

familiarise yourselves with the following:-

- **Contempt of Court** – you should be aware of the law of Contempt of Court, specifically in relation to commenting on criminal cases – if you are unsure as to what the law is do not comment on someone's arrest or on a case which is currently being heard unless you have guidance from the legal department. You should ensure that you are familiar with the Attorney General's advisories posted from time to time: <https://www.gov.uk/government/organisations/attorney-generals-office> and on Twitter @AGO_UK.
- **Children** – Family Court Proceedings – do not write about proceedings in the family court – the proceedings are designed to protect the privacy of the child.
- **Legal warnings** – you should be on the legal warning distribution list. Remember that these are private and confidential and must not be forwarded or discussed outside of the Company. If a legal warning relates to anything you have commented on in any social media please ensure that you take it down as this is your personal responsibility. Deletion, however, is not enough. You may need to issue a correction. You must discuss this with the legal department.

MONITORING

The Company reserves the right to monitor, intercept and review, without further notice, staff activities using the Company's IT resources and communications systems, including but not limited to social media postings and activities, to ensure that this policy is being complied with and for legitimate business purposes and you consent to such monitoring by your use of such resources and systems.

BREACHING THIS POLICY

Any breach of this policy may result in disciplinary action being taken by the Company in accordance with the Company's disciplinary policy up to and including dismissal. Any member of staff suspected of committing a breach of this policy will be required to co-operate with our investigation, which may involve handing over relevant passwords and login details.

Policies which overlap with the Social Media Policy are:-

Anti- Bribery and Corruption Policy
Bullying and Harassment Policy
Data Governance Policy
Data Protection Policy
Disciplinary and Dismissal Policy
Diversity Policy
Grievance Policy
IT Security and Electronic Communications Policy

Anti-Bribery & Corruption

The Company takes a zero-tolerance approach to bribery and corruption.

Under the Bribery Act 2010, bribery and corruption is punishable for individuals by up to ten years' imprisonment and if the Company is found to have taken part in corruption it could face an unlimited fine, amongst other penalties.

This policy applies to all individuals working for Express Newspapers, Northern & Shell Plc, Portland Enterprises Limited, The Health Lottery Limited, Northern & Shell Worldwide Limited **the Company**, at all levels, including directors, officers, senior managers, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with the Company, or any of the Company's subsidiaries or their employees, wherever located (collectively referred to as **workers** in this policy).

In this policy, **third party** means any individual or organisation you come into contact with during the course of your work for the Company, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisers, representatives and officials, politicians and political parties.

1. WHAT IS NOT ACCEPTABLE?

It is not acceptable for you (or someone on your behalf) to:

- 1.1 give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given (unless it is reasonable and proportionate for bona fide business relations purposes – see Section 3 below);
- 1.2 holding or accepting “unhosted” entertainment;
- 1.3 give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to “facilitate” or expedite a routine procedure;
- 1.4 accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;
- 1.5 accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by the Company in return (unless it is reasonable and proportionate for bona fide

business relations purposes – see Section 3 below) ;

- 1.6 threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- 1.7 engage in any activity that might lead to a breach of this policy.

Specific examples of a bribe can be found on page 4 of this policy. “Red flags” are set out on page 5 of this policy.

Journalists should note that there are no special rules applicable to journalism. Certain conduct may be a breach of the Bribery Act, such as the making of a payment to improperly receive information; the receiving of a payment to influence editorial decisions or the receiving of a payment to disclose a source. If you are in any doubt, you should speak to the Editorial Legal Department, the Managing Editor's Office or the Compliance Officer.

2. FACILITATION PAYMENTS AND KICKBACKS

- 2.1 The Company does not make, and will not accept, facilitation payments or "kickbacks" of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. They are not commonly paid in the UK, but are common in some other jurisdictions in which the Company operates.
- 2.2 If you are asked to make a payment on the Company's behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt which details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, you should raise these with your Head of Department or the Managing Editor's Office/HR Department or the Compliance Officer.
- 2.3 Kickbacks are typically payments made in return for a business favour or advantage. All workers must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by the Company.

3. WHAT IS ACCEPTABLE?

This policy does not prohibit normal and appropriate corporate hospitality (given and received) to or from third parties. The giving or receipt of gifts is not prohibited if the records required in Section 5 are kept and the following requirements are met:

- 3.1 it is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- 3.2 it complies with local law;

- 3.3 it is given in the Company's name, not in your name;
- 3.4 it does not include cash or a cash equivalent (such as gift certificates or vouchers);
- 3.5 it is appropriate in the circumstances. For example, in the UK it is customary for small gifts to be given at Christmas time;
- 3.6 taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time;
- 3.7 it is given openly, not secretly; and
- 3.8 gifts should not be offered to, or accepted from, government officials or representatives, or politicians or political parties, without the prior approval of your line manager or the Managing Editor's Office/HR Department or the Compliance Officer.

The Company appreciates that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable, justifiable and proportionate. The *intention* behind the gift should always be considered.

Contra-arrangements are acceptable provided that they are transparent and not used to influence an individual to improperly perform a function or activity or reward an individual for improperly performing a function or activity.

4. YOUR RESPONSIBILITIES

- 4.1 The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for the Company or under the Company's control. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 4.2 You must notify your line manager or the Managing Editor's Office/HR Department or the Compliance Officer as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. For example, if a client or potential client offers you something to gain a business advantage with the Company, or indicates to you that a gift or payment is required to secure their business. (Please see the last page of this policy for more examples of "red flags").
- 4.3 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. The Company reserves its right to terminate its contractual relationship with other workers if they breach this policy.

5. RECORD KEEPING

- 5.1 The Company must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

- 5.2 You must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to managerial review.
- 5.3 You must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with the Company's expenses policy and specifically record the reason for the expenditure.
- 5.4 All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

6. HOW TO RAISE A CONCERN

- 6.1 You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with your Head of Department or the Managing Editor's Office/HR Department or the Compliance Officer.
- 6.2 Workers who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

7. COMMUNICATION TO THIRD PARTIES

- 7.1 The Company's zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of the Company's business relationship with them and as appropriate thereafter.

8. CONTRACT OF EMPLOYMENT

- 8.1 This policy does not form part of any employee's contract of employment and it may be amended at any time.

EXAMPLES OF A BRIBE

Offering a bribe

You offer a potential client tickets to a major sporting event, but only if they agree to do business with the Company.

This would be an offence as you are making the offer to gain a commercial and contractual advantage. The Company may also be

found to have committed an offence because the offer has been made to obtain business for the Company. It may also be an offence for the potential client to accept your offer.

Receiving a bribe

A supplier gives your nephew a job, but makes it clear that in return they expect you to use your influence in the Company to ensure the Company continues to do business with them.

It is an offence for a supplier to make such an offer. It would be an offence for you to accept the offer as you would be doing so to gain a personal advantage.

Bribing a foreign official

You arrange for the business to pay an additional payment to a foreign official to speed up an administrative process, such as clearing the Company's goods through customs. The offence of bribing a foreign public official has been committed as soon as the offer is made. This is because it is made to gain a business advantage for the Company. The Company may also be found to have committed an offence.

POTENTIAL RISK SCENARIOS: "RED FLAGS"

The following is a list of possible red flags that may arise during the course of you working for the Company and which may raise concerns under various anti-bribery and anti-corruption laws. The list is not intended to be exhaustive and is for illustrative purposes only.

If you encounter any of these red flags while working for the Company, you must report them promptly to your line manager or the Managing Editor's Office/HR Department or the Compliance Officer:

- you are offered an unusually generous gift or offered lavish hospitality by a third party;
- a third party insists on receiving a commission or fee payment before committing to sign up to a contract with the Company, or carrying out a government function or process for the Company
- a third party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made;
- a third party requests that payment is made to a country or geographic location different from where the third party resides or

conducts business;

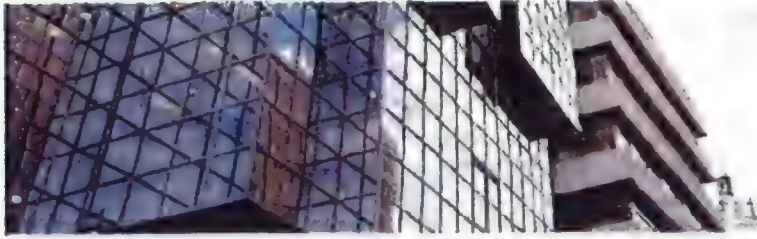
- a third party requests an unexpected additional fee or commission to "facilitate" a service;
- a third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services;
- a third party requests that a payment is made to "overlook" potential legal violations;
- a third party requests that you provide employment or some other advantage to a friend or relative;
- you receive an invoice from a third party that appears to be non-standard or customised;
- a third party insists on the use of side letters or refuses to put terms agreed in writing;
- you notice that the Company has been invoiced for a commission or fee payment that appears large given the service stated to have been provided;
- a third party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to the Company; or
- you learn that a third party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a "special relationship" with foreign government officials;

APPENDIX C

A copy of our Online Complaints Form and Policies.



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Email: expressletters@express.co.uk (<mailto:expressletters@express.co.uk>)
Call General Enquiries: 0208 612 7000

Daily Express,
The Northern & Shell Building,
Number 10 Lower Thames Street,
London,
EC3R 6EN



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[UK \(/news/uk\)](http://news/uk)



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Fury as Germans mock Britain for Brexit and EU vote while blasting our 'horse-faced Queen'



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Sunday Express

The Sunday Express is always interested in hearing about any stories you may have. If you have something you'd like to share or discuss with us, call us on:

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Email: sundaynews@express.co.uk (<mailto:sundaynews@express.co.uk>)

S MAGAZINE

Call: 0208 612 7257

Email: Sundaymag@express.co.uk (<mailto:Sundaymag@express.co.uk>)

DEPUTY PICTURE EDITOR: Jim Selby

Call: 0208 612 7176

INVESTIGATIONS EDITOR: James Murray

Call: 0208 612 7073

Email: james.murray@express.co.uk (<mailto:james.murray@express.co.uk>)

CITY EDITOR: Geoff Ho

Call: 0208 612 7370

Email: geoff.ho@express.co.uk (<mailto:geoff.ho@express.co.uk>)

HEALTH EDITOR: Lucy Johnston

Email: Lucy.Johnston@express.co.uk (<mailto:Lucy.Johnstone@express.co.uk>)

ROYAL EDITOR: Camilla Tominey

Call: 0208 612 7853

Email: Camilla.Tominey@express.co.uk (<mailto:Camilla.Tominey@express.co.uk>)

SPORTS EDITOR: Scott Wilson

Call: 0208 612 3116

Email: scott.wilson@express.co.uk (<mailto:scott.wilson@express.co.uk>)

FEATURES EDITOR: Amy Packer

Call: 0208 612 7124

Email: amy.packer@express.co.uk (<mailto:amy.packer@express.co.uk>)

ARTS AND ENTERTAINMENT EDITOR: Clair Woodward

Call: 0208 612 7279

Email: clair.woodward@express.co.uk (<mailto:clair.woodward@express.co.uk>)

TELEVISION EDITOR: David Stephenson

Call: 0208 612 7011

Email: david.stephenson@express.co.uk (<mailto:david.stephenson@express.co.uk>)

FILM EDITOR: Henry Fitzherbert

Call: 0208 612 7475

Email: henry.fitzherbert@express.co.uk (<mailto:henry.fitzherbert@express.co.uk>)

LITERARY/MUSIC EDITOR: Charlotte Heathcote

Call: 0208 612 7296

Email: charlotte.heathcote@express.co.uk (<mailto:charlotte.heathcote@express.co.uk>)

DIARY EDITOR: Adam Helliker

Call: 0208 612 2750

Email: adam.helliker@express.co.uk (<mailto:adam.helliker@express.co.uk>)

TRAVEL EDITOR: Jane Memmler

Email: travel@express.co.uk (<mailto:travel@express.co.uk>)

MOTORING EDITOR: Nat Barnes

Email: Motors@express.co.uk (<mailto:Motors@express.co.uk>)



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Glasgow News Desk

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Scottish Sunday Express

Call: 0141 352 2519

Email: scotsunday@express.co.uk (<mailto:scotsunday@express.co.uk>)

Scottish Sunday Express

Email: scotssport@express.co.uk (<mailto:scotssport@express.co.uk>)



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This policy only applies to complaints about editorial content in our publications and the digital services that we control. It does not cover:

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1. From any person who has not been personally and directly affected by the matter complained of;
2. That are trivial, hypothetical or otherwise vexatious or insignificant;
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When handling your complaint we will treat you fairly, courteously and with respect. We may decline to consider any complaint that is abusive or gratuitously offensive.

If at any stage of your complaint we do not hear back from you within 28 days, we will consider your complaint satisfied and closed.

In order to fully understand and consider your complaint under the terms of The Code it is vital that all correspondence is conducted with courtesy and is limited to only the issues in hand. Express Newspapers reserves the right to reject any complaint or contact without further contact where abusive, offensive, insulting or intimidating language has been or is being used.

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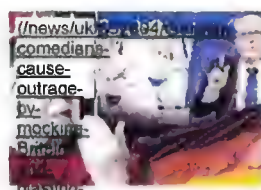
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We reserve the right to amend this policy as required. We will publish the current policy on our website. Your



'10,000 deportees will be released onto Britain's streets' following new ruling

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Stick-fingered yob seals woman's car with SUPERGLUE in bizarre prank

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APPENDIX D

A list of complaints pursued under the Editors' Code of Practice.

| Publication | Date Complaint Received | Title of Article | Complainant | Clause Relied On | Details of Complaint | Action Taken | IPSO Decision |
|-----------------------|-------------------------|--|-------------------|------------------|---|--|---|
| Daily Express Website | 27/10/14 | "Climate change proved to be nothing but a lie, claims top meteorologist" | Vincent Wilkinson | 1 | The findings of the InterAcademy Council's report had been misquoted. It had not found "little evidence" to support the IPCC's claims about global warming nor had it found that the IPCC had made substantive findings based on little proof and the article was therefore misleading | The article was significantly inaccurate and in breach of the Code. It was amended and a footnote was appended to it | Complaint upheld, but actions taken were sufficient to remedy the breach |
| Daily Express Website | 25/11/14 | "UKIP now more popular than Labour: Nigel Farage gets polls boost as Ukip surges ahead" | Robert Bray | 1 | The article was inaccurate because it presented the results of a YouGov poll of Sun readers as though they were normal poll results. The Sun readers poll was a subsection of a YouGov poll which overall put Labour ahead | The online article should have clarified that the poll was a poll of Sun readers. A clarification was published online. The complainant wanted the clarification to include an apology. He was told that an apology was not appropriate | Complaint upheld and was sufficiently serious to require an adjudication to be published online |
| Express Website | 6/1/15 | "Ice in the Arctic and Antarctic is 'not melting' says global warming expert" | Vince Wilkinson | 1 | The article was inaccurate because the "global warming expert" was not a global warming expert and the article was not clear about who the expert was | Whilst it was not accepted that the article was inaccurate, it was amended and a clarification added as a footnote | No breach of clause 1. Not upheld |
| Daily Star Website | 14/1/15 | "She slept with your husband' Sallie Axl and Nicola McLean at war over CBB Alicia Douvall" | [REDACTED] | 1 | The article was inaccurate because it claimed that [REDACTED] | [REDACTED] It was not inaccurate | Not pursued further. |
| Daily Star Website | 20/1/15 | "Too fat to wash! Grubby Gran who weighed 27 stone did not have a bath for 20 years" | Linda Pearson | 1, 3 & 12 | The headline was inaccurate, intrusive and discriminatory. Whilst Mrs Pearson had not bathed for 20 years she had washed and was not grubby. The article wrongly stated that she had a gastric band fitted when she had actually undergone a gastric bypass and the article had intruded into the private life of her grandson who had been taunted as a result | The headline was changed immediately on receipt of the complaint. A correction and apology was published on the home page. The text that referred to Mrs Pearson as having a gastric band fitted was amended. It was not accepted that the article was a breach of privacy or discriminatory | Complaint upheld in respect of clause 1 but no breach of clause 3 or 12. Appropriate action had been taken and nothing further was required |
| Daily Express | 23/1/15 | "80% want to quit the EU" | [REDACTED] | 1 | The article was misleading because the poll was carried out by 3 self confessed Euro sceptics and was therefore biased. The poll had not been carried out by a known organisation and only sampled a small area of the country. | The article was very clear about who had organised the poll, how many people had voted, that it was a Tory poll and that it involved three neighbouring constituencies. It was not inaccurate | Not pursued further. |
| Daily Express | 23/1/15 | "80% want to quit the EU" | [REDACTED] | 1 | The article was misleading because it reported the results of the poll as if it represented the whole country. | The article was clear in respect of the number of people that took part and the areas of the country where the poll took place. It was not inaccurate | Not pursued further. |
| Daily Express | 23/1/15 | "80% want to quit the EU" | [REDACTED] | 1 | The article was misleading because the poll was not carried out in accordance with normal polling practices. The poll was carried out in an amateur and inaccurate manner which made the results worthless | The article was clear in respect of the number of people that took part and the areas of the country where the poll took place. It was not inaccurate | Not pursued further. |

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| Daily Star Sunday and Website | 3/2/15 | "Darts champ banned amid drugs claims" | Professional Darts Corporation | 1 & 2 | The PDC complained that the article was inaccurate because it had incorrectly referred to it as the governing body of professional darts in the UK and said that it would be holding a disciplinary hearing which it does not have the power to do. It also alleged a breach of clause 2 as it had not been given the opportunity to respond to the comments left beneath the online article. | We accepted that there had been a breach of Clause 1 but not Clause 2 | The complaint in respect of Clause 1 was upheld and we were required to publish a correction on the online article |
| Sunday Express | 4/2/15 | "Monsters given their own cell keys" | Nicholas Black | 1 | The article was inaccurate because it said that prisoners were given keys to their cells and were free to come and go as they please. In fact they were only able to leave their cells at certain times and were given a key so that they could secure the cells to stop others entering | A correction had already been published following a complaint through our internal complaints process. Mr Black was not happy with the prominence of the correction as the story was on the front page. Our view was that the correction column was an established column and was sufficiently prominent | The complaint was upheld. The committee held that the original correction was not sufficiently prominent and an adjudication had to be published on page 2 |
| Daily Star and Website | 4/2/15 | "Meet the adult babies at a nursery that stocks man-sized nappies" | [REDACTED] | 1 & 3 | [REDACTED] complained that the article was inaccurate because [REDACTED] had not signed release forms and not discussed revealing [REDACTED] and had no idea that the article was to be published in the Liverpool Echo, from where the story was syndicated to us. In addition the article was a breach of Clause 3 because [REDACTED] | [REDACTED] and offer their services to similar minded individuals, advertising their services on various websites. They have appeared on television a number of times. [REDACTED] featured in various publications over the years. [REDACTED] regularly appear in the press [REDACTED]. Our article only mentioned [REDACTED]. It does not disclose the neighbourhood or address. Their whereabouts could not be ascertained from the article. There was no breach of the Code. | The complaint was not pursued further |
| Daily Express | 6/2/15 | Peniless trucker in battle over internet bride's £300k fortune" | Marina Ivleva | 1,2,3,4 & 10 | Ms Ivleva was the internet bride referred to in the article. She complained that the article inaccurately reported the date of the court hearing, her nationality, her income and her employment details. She said that she should have been given the opportunity to respond prior to publication, that the article was an intrusion into her privacy, that reporters had harassed her family and friends in the Ukraine, that the published photographs had been stolen from her computer and that the article was discriminatory because of her Ukrainian background | The article was a report of the divorce proceedings between Ms Ivleva and her husband. The comments in respect of her wealth had come from her husband outside the court. We considered that this could have been made clearer and offered to publish a correction. This was rejected. We did not accept that any of the other clauses had been breached. The article was based on Ms Ivleva's appeal heard in open court. The photograph came from an agency and we had no reason to believe that it had been stolen. We did not employ any journalists in Russia or the Ukraine and had no knowledge of the journalist accused of harassing her. The fact of her being from the Ukraine was relevant because she had tried to divorce her husband in the Ukraine without him knowing | The complaint was not upheld |
| Sunday Express & Express Website | 13/2/15 | "Scandal as 280,000 tons of recycling ends up as landfill" and "We 'recycle' yet so much ends up on landfill sites says Ross Clark" | [REDACTED] | 1 | Both articles were inaccurate because they were based on a misconception in respect of what "contaminated" meant in the context of recycling. The article had claimed that 280,000 tonnes of recyclable material had been rejected for being contaminated, but this figure included waste that was not recyclable material. Also no context was given in respect of the percentage of waste that the 280,000 tonnes amounted to. The Ross Clarke comment piece was opinion based on this incorrect interpretation of what contaminated waste was and also mentioned the rejected recycling going to land-fill which was incorrect. | We accepted that there were some inaccuracies in the article. After lengthy correspondence on the matter it was finally resolved to the satisfaction of the complainant. A correction was published in the print edition and online and the Ross Clarke article was removed | Resolved so not considered by the Committee |

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| Daily Express and Website | 15/9/15 | "Britain will refuse to accept more refugees as EU leaders call emergency summit" | | | complainant complained that the article was inaccurate because the UK is not part of the Schengen Agreement or the Common Joint Asylum Policy. | The article was inaccurate and amended | We did not hear further from the complainant |
| Scottish Daily Express | 9/3/15 | "Dentist wins £50,000 from patient" | Andrew McIntosh | | Mr McIntosh complained that the report of the legal proceedings was inaccurate. He was the patient concerned and actually won the case against the dentist | An apology and correction were published | Resolved so not considered by the Committee |
| Scottish Daily Star | 9/3/15 | "Dentist wins £50k for patient's false claims" | Andrew McIntosh | | Mr McIntosh complained that the report of the legal proceedings was inaccurate. He was the patient concerned and actually won the case against the dentist | An apology and correction were published | Resolved so not considered by the Committee |
| Express Website | 30/3/15 | "Children as young as eight given gun licences" | Sean Boyd | | Sean Boyd complained that the article was inaccurate because the picture showed a handgun which is an illegal firearm. The HTML title was "Licenced to kill at 8" but the granting of a shotgun licence does not give anyone a licence to kill. He said that the article was anti-gun | We accepted that the picture showing a child reaching for a handgun was inaccurate. The image was removed and a correction was placed on the homepage and on the article. We did not accept that the text of the article was inaccurate | Complaint in respect of the image was upheld. Sufficient remedial action had been taken and nothing further was required |
| Express Website | 17/4/15 | "Cutting calories can beat dementia" | Andy Tysoe | | The article was inaccurate because dementia is not one disease but an umbrella term for more than 100 different brain diseases, dementia cannot be cured, beaten or the misery ended and it gives false hope to hundreds and thousands of people. | It was not accepted that the article was inaccurate, but it was amended to make it clearer that the reference to dementia was to the common symptoms of the diseases that are covered by the term dementia | The complaint was not upheld |
| Express Website | 17/4/15 | "Simple way to fight dementia" | Andy Tysoe | | The article was inaccurate because dementia is not one disease but an umbrella term for more than 100 different brain diseases, dementia cannot be cured, beaten or the misery ended and it gives false hope to hundreds and thousands of people | The article did not state that dementia could be cured but looked at certain factors that had been found in a study to increase memory loss in all age groups. It was not accepted that the article was inaccurate, but the headline was amended to make it clearer that dementia is not one disease and that the reference to it, was to the common symptoms of the diseases covered by the term dementia | The complaint was not upheld |
| Daily Express and Website | 17/4/15 | "Sleep to beat Alzheimer's" | Andy Tysoe | | The article was inaccurate because dementia is not one disease but an umbrella term for more than 100 different brain diseases, dementia cannot be cured, beaten or the misery ended and it gives false hope to hundreds and thousands of people | The article was a report about preventative measures in respect of one type of dementia. It did not say that Alzheimer's could be cured. We did not consider it to be inaccurate | The complaint was not upheld |
| Express Website | 17/4/15 | "Just three cups of coffee a day could slash the risk of Alzheimer's, study finds" | Andy Tysoe | | The article was inaccurate because dementia is not one disease but an umbrella term for more than 100 different brain diseases, dementia cannot be cured, beaten or the misery ended and it gives false hope to hundreds and thousands of people | The article was clearly about preventative measures. The term dementia covers a broad range of brain diseases which share the common symptoms of a decline in mental ability or cognitive function. Where the term dementia was used in the article, it was used correctly. We did not consider the article to be inaccurate | The complaint was not upheld |

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| Daily Express and Website | 17/4/15 | "Pill that may halt the misery of dementia" | Andy Tysoe | 1 | The article was inaccurate because dementia is not one disease but an umbrella term for more than 100 different brain diseases, dementia cannot be cured, beaten or the misery ended and it gives false hope to hundreds and thousands of people | The article made it clear that it was about an hereditary form of dementia. It did not claim that the disease could be cured, in fact it quoted a Professor David Smith as saying, "It is unlikely that we will ever be able to cure dementia." We did not consider it to be inaccurate. | The complaint was not upheld. |
| Express Website | 6/5/15 | "Alcoholic immigrant with 80 convictions can't be deported because of EU human rights law" | [REDACTED] | 1 | The article was inaccurate because The Human Rights Act is an act of Parliament not an EU matter. The article was illustrated with an EU flag | We accepted that the article was inaccurate and it was amended, the picture removed and a footnote correction added. | We did not hear from [REDACTED] again |
| Express Website | 6/5/15 | "SNP would ruin the economy and out national security" | [REDACTED] | 1 | The article was inaccurate [REDACTED] | We accepted that the article was inaccurate. It was amended and correction added as a footnote | The complaint was resolved and not considered by the Committee |
| Sunday Express and Website | 6/5/15 | "Revealed: Most commonly prescribed stroke drug linked to fatal brain bleeds and death" | [REDACTED] | 1 | The article was inaccurate because it exaggerated the danger of the drug. Guidelines supported the use of alteplase up to 4 hours after a stroke, but the article said that the guidelines supported its use up to 40 hours after which made it appear that doctors were risking patients' lives | In the print version of the article, it correctly stated that guidelines supported the use of alteplase up to 4 hours after a stroke so it was not inaccurate. In the online version, after the number 4, there was "o-acute" not a zero and it was very clear that it was a typographical error. The article was amended and a footnote added | We did not hear further from the complainant |
| Express Website | 21/5/15 | "39 of the world's worst mugshots" | Changing Faces | 12 | Changing Faces complained that the article was discriminatory because a number of the images featured were of people with unusual appearances as a result of medical conditions or injuries | We did not accept that the article was a breach of the Code, but agreed that it was in bad taste. The article was removed from the website and an apology was published on the home page. | The complaint was resolved and was not considered by the Committee |
| Express Website | 2/7/15 | "Fears of imminent British terror attack as police see surge in smuggled submachine guns" | [REDACTED] | 1 | The article was inaccurate because it mentioned weapons that can fire 1,000 rounds per second which was incorrect. | The weapon in question was only capable of firing 850 rounds per second. We did not accept that this was a serious inaccuracy, but agreed to amend the article | The complaint was resolved and was not considered by the Committee |
| Daily Express and Website | 27/7/15 | "SPECIAL INVESTIGATION: 311 languages spoken in our schools as English starts to die out" | Jonathan Portes | 1 | The article was inaccurate because the statistics relied on, were in respect of English as a second language which is not the same thing as not speaking English. In addition, the article gave the impression that some lessons were not being taught in English | We accepted that the article was inaccurate and offered to publish a correction. Mr Portes demanded that the correction be published on the front page | Complaint upheld and was sufficiently serious to require an adjudication to be published in print and online. Because it was a front page article, a reference to the adjudication had to appear on the front page |
| Express Website | 6/8/15 | "Police haul abusive Brits off Ibiza flight for drunkenly abusing cabin crew" | Philip Howell | 3 & 9 | A picture that illustrated this article, that featured the captain of the aircraft, Mr Howell, was a breach of clauses 3 and 9 because it could result in him being targeted by the accused men. He did not want to be associated with any potential prosecution that might be brought by the Civil Aviation Authority. He also said that his image had nothing to do with the story and had added nothing to it | We did not consider the image to be in breach of the Code | The complaint was not upheld |

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| Express Website | 27/8/15 | "DJ Suzie McGuire's violent husband faces jail for domestic abuse" | [REDACTED] | 1, 3, 4 & 7 | The article was inaccurate because certain statements were not true. It was a breach of privacy because [REDACTED] claimed [REDACTED] had been followed by a photographer, even when he asked them to stop. He also complained about the fact that [REDACTED] was named in the article. | We did not accept that the Code had been breached. The statements complained of were taken from the evidence given in court, and amounted to a fair and accurate report of that evidence. The photograph was taken [REDACTED] so not in a private place, and revealed no private information about the complainant. An agency provided the image, and so it was not a matter Express Newspapers could assist with. [REDACTED] was neither a witness nor a victim of a sexual assault and clause 7 did not apply. | The Committee considered clauses 1 and 3 only. The complaint was not upheld. |
| Express Website | 14/9/15 | "Pet owners warning: poisonous snakes with the power to kill pets sweep across Britain" | [REDACTED] | 1 | The photograph used in the online article was a python, not an adder. | The picture was removed from the article. | Resolved so not considered by the Committee. |
| Daily Express and Website | 21/9/15 | "Alzheimer's bombshell: British experts find disease can be passed between humans" | [REDACTED] | 1 | The story was inaccurate because it did not correctly report the findings of research that featured in the report. It was not correct to state that Alzheimers could be passed between humans as it was the seed of the disease that could attach to surgical implements and be passed on during operations. | We accepted that the headline was misleading and the online article was amended. | The complaint was resolved and not considered by the Committee. |
| Express Website | 21/9/15 | "Warning: Britain faces a new wave of gun massacres amid fears over firearms laws" | Sean Boyd | 1 & 12 | The article was inaccurate because it featured an image showing automatic weapons that are illegal. It was also inaccurate because the report upon which it was based did not say that there would be a massacre and there had not been any massacres in this country. It was discriminatory against gun owners because it portrayed them as having mental illnesses. | We accepted that the image was incorrect and this was changed. We did not accept that the article was inaccurate as the use of the term massacre was the author's own interpretation of the report. Clause 12 was not engaged. | The complaint was not upheld. |
| Daily Express | 1/10/15 | "Maddy detective did lie about death cover up claim" | Antony Bennett | 1 | The front page headline was inaccurate because the Portuguese court did not consider the issue of whether Mr Amaral had lied in his book but whether the McCann's rights outweighed his right to freedom of expression. | We accepted that the headline was inaccurate, but not significantly so. After some negotiation we agreed to publish a correction. | The complaint was resolved and not considered by the Committee. |
| Daily Express and Website | 7/10/15 | "They've killed, raped and violated children, but EU demands evil lags be given the vote" | [REDACTED] | 1 | The article was inaccurate because it mentioned the EU but it was about the ECHR and nothing to do with the EU. | We did not accept that the article was inaccurate. It was about a European Court's decision not the ECHR so it was correct. | We did not hear further from the complainant. |
| Express Website | 12/10/15 | "Pet owners warning: Poisonous snakes with the power to kill pets sweep across Britain" | [REDACTED] | 1 | The article was inaccurate because adders are venomous not poisonous, attacks on dogs are rare and the image used to illustrate the article was of a python, not an adder. | The image had already been changed. The rest of the article, when considered with the headline was not inaccurate. | The complaint was resolved and not considered by the Committee. |
| Express Website | 28/10/15 | "Incredible pictures show [REDACTED] [REDACTED] [REDACTED]" | [REDACTED] | 3 & 8 | A photograph was published [REDACTED] in breach of their privacy and whilst [REDACTED] The family said they were feeling harassed by photographs been taken on hospital grounds and they have anxieties about attending further appointments. | The photograph was taken in a public [REDACTED] [REDACTED] was not engaged in a private act and was in a public place. The picture did not reveal any private information about [REDACTED] [REDACTED] was not identified. Following the much publicised crash, [REDACTED] appearance was a matter for public scrutiny and debate and the publication was in the public interest. Clause 8 did not apply. | The complaint was withdrawn. |

EDITORS' CODE OF PRACTICE
IPSO COMPLAINTS

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|--------------------|----------|--|------------|-------|---|--|--|
| Daily Star Website | 28/10/15 | *First pictures of [REDACTED] [REDACTED] | [REDACTED] | 3 & 8 | A photograph [REDACTED] in breach of their privacy and whilst on hospital grounds. The family said they were feeling harassed by photographs been taken on hospital grounds and they have anxieties about attending further appointments, | The photograph was taken in a public [REDACTED] park [REDACTED] was not engaged in a private act and was in a public place. The picture did not reveal any private information about [REDACTED] was not identified. Following the much publicised crash, [REDACTED] appearance was a matter for public scrutiny and debate and the publication was in the public interest. Clause 8 did not apply. | The complaint was withdrawn |
| Express Website | 19/11/15 | *World's worst disfigurement? Young woman born with no face hopes for surgery" | [REDACTED] | 1 | It was inaccurate to suggest that the subject did not have a face. She suffered from neurofibromatosis which causes tumors to grow, obscuring the face. | Whilst in a literal manner it was not correct to describe the subject as having no face, the article was not inaccurate. The complaint was on a matter of taste rather than a Code issue, but we agreed to amend the headline as a courtesy to others with a similar condition that may have been offended | The complaint was resolved and not considered by the Committee |

EDITORS' CODE OF PRACTICE
INTERNAL COMPLAINTS

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|---------------------------|---------|---|------------|---|---|--|
| Express Website | 6/1/15 | "Four in five new NHS nurses are foreign as hospitals accused of 'panic buying' staff" | [REDACTED] | 1 | The headline was inaccurate because the number quoted was the net difference rather than the number of new nurses. | The headline was misleading, although the article was accurate. The headline was amended and a footnote added to the article. |
| Daily Star Website | 16/1/15 | "Tragic son, 4, crushed to death under truck as parents tried to flee cops" | [REDACTED] | 6 | The article used a picture showing a child's corpse under a truck which was disgusting and a breach of the child's privacy. | Whilst the Code was not engaged, the picture was removed from the online article. |
| Daily Express and Website | 21/1/15 | "80% of Britons want to quit the EU in biggest poll for 40 years" | [REDACTED] | 1 | The article was inaccurate because it was not the largest poll and it only covered the East Midlands so not representative of the whole population. | The article made it very clear as to how the poll was conducted, who organised it, the number of people that took part and the areas of the country in which the poll took place. It was not inaccurate. |
| Express Website | 22/1/15 | "Kate and Gerry McCann win court victory in £1million libel battle against ex-police chief" | [REDACTED] | 1 | The article was inaccurate because the McCanns had almost everything disproved in their libel case. | The article made it clear that the McCanns had not won their claim and that they had not won on every point. It was also made clear that the matter was ongoing. It was not inaccurate. |
| Express Website | 22/1/15 | "Kate and Gerry McCann win court victory in £1million libel battle against ex-police chief" | [REDACTED] | 1 | The article was inaccurate because the McCanns had almost everything disproved in their libel case. | The article made it clear that the McCanns had not won their claim and that they had not won on every point. It was also made clear that the matter was ongoing. It was not inaccurate. |
| Express Website | 22/1/15 | "Kate and Gerry McCann win court victory in £1million libel battle against ex-police chief" | [REDACTED] | 1 | The article was inaccurate because the McCanns had almost everything disproved in their libel case. | The article made it clear that the McCanns had not won their claim and that they had not won on every point. It was also made clear that the matter was ongoing. It was not inaccurate. |
| Sunday Express | 25/1/15 | "Monsters given their own cell keys! Rosemary West and Ian Huntley roaming at will" | [REDACTED] | 1 | The article was inaccurate because it insinuated that prisoners were allowed to come and go as they please. However, the keys are for the prisoners' privacy, to be used to lock cells at times when the doors would be open anyway. | We accepted that the article was inaccurate and a correction was published. |
| Daily Express | 2/2/15 | "Scandal of Britain's £2.1 billion wasted on European Court of Human Rights cases" and "Why must we be part of this human rights farce" | [REDACTED] | 1 | The articles were inaccurate because applicants to the ECHR do not receive legal aid, only a very small proportion of the applications concerning the UK were followed up by the Court and an even smaller number of cases actually result in a judgment against the UK which could have any financial implications whatsoever. | We accepted that the articles were inaccurate. The online articles were removed and a correction was published in the paper. |

EDITORS' CODE OF PRACTICE
INTERNAL COMPLAINTS

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|--------------------|---------|---|------------|--------|---|---|
| Daily Express | 6/2/15 | "Don't revive the death tax and sell equity in property to buy care' Blunkett tells better off" | [REDACTED] | 1 | [REDACTED] complained that the article was inaccurate | A correction was published. |
| Daily Star Website | 15/2/15 | "Graphic Content: Baby's face ripped apart by Staffordshire bull terrier" | [REDACTED] | 6 | The pictures used in the article were a breach of the child's human rights. | The complainant was not a parent or relative of the child, so the Code was not engaged. In any event, the picture was used with the parents permission. |
| Express Website | 23/2/15 | "Sara Cox helps convict two thieves after tweeting CCTV of them raiding her brother's house" | [REDACTED] | 3 & 14 | [REDACTED] | The fact that [REDACTED] in open court. As such we were entitled to publish it. |
| Express Website | 24/2/15 | "It's free money. Shameless mother funds globetrotting holiday with benefits" | [REDACTED] | 1 & 3 | [REDACTED] said that we had copied the story from the Mirror, [REDACTED] and that the story was inaccurate and [REDACTED] did not give permission to use the pictures of [REDACTED]. | [REDACTED] had sold the pictures and story to an agency, which syndicated the story to us. Permission had been given by [REDACTED] for the pictures of [REDACTED] but in any event they were pixilated on the website. The inaccuracies were corrected. |
| Express Website | 28/2/15 | "Family of British girl thought to have fled to Syria 'can't stop crying' say father" | [REDACTED] | 1 | The article featured a picture, purporting to be of Aqsa Mahmood, one of the schoolgirls believed to have travelled to Syria to join ISIS. In fact the picture was of [REDACTED] | The photograph was removed from the article and from the library. An apology was published on the homepage of the website. |
| Express Website | 8/3/15 | "Children as young as eight given gun licences" | [REDACTED] | 1 | The picture used to illustrate the article showed a child reaching for a handgun, which are illegal in this country. The article was about shotgun licences and therefore the picture was misleading. | The picture was removed and a correction published on the homepage of the website. |
| Express Website | 9/3/15 | "New migrant flood on way: Outrage after EU warns Britain to prepare for more foreigners" | [REDACTED] | 1 | The article was inaccurate because it referred to "bogus refugees". As refugees have already been granted asylum, it was incorrect to describe them as bogus. | The article was amended and a footnote correction added to it. |
| Express Website | 18/3/15 | "Muslims could be forced to print Prophet Mohammed images following gay marriage cake row" | [REDACTED] | 1 | The headline was inaccurate because the dispute was between a Christian baker and a gay man and it implied that a Muslim was involved. | The article was not inaccurate. It clearly explained what the dispute was about. The reference to Muslims was a quote from a lawyer who had commented on the implications of the decision. |

EDITORS' CODE OF PRACTICE
INTERNAL COMPLAINTS

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| Daily Express and Website | 2/4/15 | "Why watching TV gives you diabetes" | [REDACTED] | 1 & 12 | The article did not distinguish between type 1 and 2 diabetes and it was discriminatory against people with type 1 diabetes that have done nothing wrong. | The article was based on research carried out in the US that looked at data from over 3,000 overweight adults on a type 2 diabetes prevention programme. It was clear that the findings were limited to people with type 2, or at risk of getting type 2. Clause 12 not engaged. |
| Daily Express and Website | 2/4/15 | "Why watching TV gives you diabetes" | [REDACTED] | 1 | The headline was inaccurate because it insinuated that you can develop diabetes from watching TV. | The headline must be considered together with the article, which explained the findings in detail. There was no breach of the Code. |
| Express Website | 10/5/15 | "Deadly "kissing parasite" that sneaks in beds and bites your face at night is invading UK" | [REDACTED] | 1 | [REDACTED] complained that [REDACTED] and that the quotes [REDACTED] were false. [REDACTED] said that the article was inaccurate, misleading and contained distorted information. | The quotes were taken from [REDACTED] guest post on The Public Library of Science - Science Blog Network (PLOS). Having checked the content of the post with the quotes [REDACTED] they were all accurate. |
| Daily Star Website | 15/5/15 | "Plastic surgeon who left woman looking 'like something from a horror movie' is struck off" | [REDACTED] | 1 | [REDACTED] wanted the article removed as it was no longer accurate and was causing problems [REDACTED] | The article correctly reported that [REDACTED] had been struck off after a ruling from a tribunal found that [REDACTED] "standards fell below or seriously below those expected of a competent cosmetic surgeon" and we were entitled to report it. |
| Daily Express and Website | 27/5/15 | "Britain already has all the human rights we need, says Leo McKinstry" | [REDACTED] | 1, 2 & 5 | [REDACTED] complained that the article cited the death of Amy Houston as a reason for getting rid of the Human Rights Act. He said that Amy's father had publicly stated that by using Amy in this way, his felt that his daughter's memory had been dishonoured. By continuing to use Amy as an example, we were breaching clauses 2 and 5. [REDACTED] further complained that the Human Rights Act was not relevant to the case cited and so the article was inaccurate. | It was correct that the reason Mr Ibrahim was allowed to stay in the country was the fault of the Home Office, the reason he could not then be deported at a later date, was because he successfully used the Human Rights Act to remain. The article was not inaccurate. Clause 2 and 5 were not available to [REDACTED]. |
| Express Website | 11/6/15 | "We can't cut migrant benefits: Barny Euro Court risks Cameron's plan to slash handouts" | [REDACTED] | 1 | The article was inaccurate and misleading because it reported that the Euro Court had made a ruling, when in fact it was only the opinion of the Advocate-General. | There was no breach of the Code as the article made it clear that the statements quoted were the advice and opinion of the Advocate-General. The article was amended to make it clearer. |
| Express Website | 17/7/15 | "Shocking £140m annual bill to feed and house asylum seekers - and you're paying for it" | [REDACTED] | 1 | The term "failed refugee" was used in the article which is inaccurate. | The article was amended and a footnote added. |
| Daily Express and Website | 19/7/15 | "Lady golfers suspended after complaining about breast-feeding mother" | [REDACTED] | 1 | [REDACTED] complained that the article was inaccurate because it reported that [REDACTED] a member of the golf club for 34 years, which was incorrect. | This was not a material or significant inaccuracy, but the online article was amended. |

EDITORS' CODE OF PRACTICE
INTERNAL COMPLAINTS

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| Express Website | 10/7/15 | "Britons to be fined by meddling European Union for not recycling enough" | [REDACTED] | 1 | [REDACTED] complained that the article was misleading because the headline suggested that fines could be levied upon individuals. It was also inaccurate because it gave the impression that the EU legislation applied to individual households and the word forced was inappropriate. | We did not accept that the article was significantly inaccurate, but made some minor amendments to it. |
| Daily Express | 18/7/15 | "The diet to beat diabetes: Ditch sugar and eat more fruit and veg" | [REDACTED] | 1 | The article should make it clear that it related to type 2 diabetes. | The article did state that it related to type 2 diabetes, but the sub-heading of the online version of the article was amended to make it clearer. |
| Express Website | 22/7/15 | "Alleged paedophile could dodge extradition to the US under human rights legislation" | [REDACTED] | 1 | [REDACTED] complained that the article was inaccurate because it referred to EU human rights legislation which was incorrect. | We accepted that the article was inaccurate. It was amended and a correction added as a footnote. |
| Daily Star Website | 27/7/15 | "How embarrassing! Model flashes crotch in explicit wardrobe malfunction" | [REDACTED] | 3 | [REDACTED] complained that the article was a breach of [REDACTED] in that the article included explicit text and pictures. | There was no breach of the Code. The image was taken in a public place and did not reveal any private information. The text was not explicit and the photograph was pixilated. |
| Express Website | 27/7/15 | "Woman claimed £20,000 in benefits while working as costume designer on Hollywood films" | [REDACTED] | 1 | The article was inaccurate because it wrongly reported that [REDACTED] [REDACTED] [REDACTED] | Whilst the focus of the article was [REDACTED] we agreed to amend the other elements. |
| Express Website | 4/8/15 | "Man left fighting for life after LSD overdose as popularity of hippy acid soars" | [REDACTED] | 1 | The article was inaccurate because it said that LSD was involved when all of the evidence suggested otherwise, and because LSD is very unlikely to have been the cause of an overdose. | The article did make it clear that a man had to be put into a medically induced coma after taking LSD which was factually correct. Whilst the headline should be considered with the text of the article, we agreed to amend it. |
| Express Website | 4/8/15 | "Man left fighting for life after LSD overdose as popularity of hippy acid soars" | [REDACTED] | 1 | The headline was inaccurate because LSD is not toxic and cannot be overdosed upon. | The article did make it clear that a man had to be put into a medically induced coma after taking LSD which was factually correct. Whilst the headline should be considered with the text of the article, we agreed to amend it. |
| Express Website | 4/8/15 | "Man left fighting for life after LSD overdose as popularity of hippy acid soars" | [REDACTED] | 1 | The headline was inaccurate because LSD is not toxic and cannot be overdosed upon. | The article did make it clear that a man had to be put into a medically induced coma after taking LSD which was factually correct. Whilst the headline should be considered with the text of the article, we agreed to amend it. |

EDITORS' CODE OF PRACTICE
INTERNAL COMPLAINTS

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| Express Website | 6/8/15 | "Immigrants will 'clog the UK courts with human rights cases to avoid eviction'" | | 1 | The article was inaccurate because it made reference to the EU human rights which is incorrect. | The article was amended and a correction added as a footnote. |
| Daily Express and Website | 17/8/15 | "Labour front-runner Jeremy Corbyn branded anti-semitic" | | 1 | The quotes came from a blog published in the New Statesman but had been reported inaccurately. | The articles were inaccurate. The online article was removed. A correction was published in the print edition and on the website's home page. |
| Daily Express and Website | 19/8/15 | "Look at the people who benefit from human rights law, blasts Stephen Pollard" | | 1 | There were 6 inaccuracies in the article: Mr Hirst did not keep going back to the ECHR he only went once; £1.7m of tax payers money was not handed out in compensation last year; the Algerian immigrant was allowed to stay in the UK but his protection plan was not overturned; Cait Reilly lost her human rights claim so she did not argue successfully that being made to work in return for benefits was a form of forced labour under human rights law; Abdullah Munawar was not allowed to remain in the UK because he played cricket; and it was not correct to say that the HRA put judges' decisions above the will of parliament. | We accepted that there were four significant inaccuracies in the article. A correction was published in the print edition and online and the article was removed. |
| Express Website | 13/9/15 | "Mum told she 'should be in prison' by a Muslim man for putting her feet up on a train" | | 12 | complainted that the article incited racial hatred because it focused on the man being a Muslim and communicated irrelevant information with extreme bias. | Clause 12 was not engaged as was not the subject of the article. It was explained to her that the man had referred to the fact that he was a Muslim and gave this as a reason for being upset that the woman had her feet on the seat. He did threaten to call the police so the article was accurate and the fact the man was a Muslim was relevant to the story. |
| Daily Express and Website | 23/9/15 | "The real reason why we are turning our back on doing it ourselves" | | 1 | complainted that the quote in the article had been wrongly attributed | A correction was published in the print edition and online. |
| Express Website | 23/10/15 | "Revealed: The evil monster haunting Jeremy Corbyn's past" | | 2,4 & 12 | complainted that the article was "puerile rubbish". | No Clauses of the Code had been breached. was informed that the clauses she had complained under only applied to individuals that were the subject of the article. |
| Express Website | 13/10/15 | "Boost for Britain's hopes of leaving the EU as new campaign vows to take back Brussels control" | | 1 | The article incorrectly referred to the European Court of Human Rights as a bloated EU institution. | The article was amended and a correction added as a footnote. |
| Express Website | 22/10/15 | "Drunk driver says he had to drive because his girlfriend was even more drunk than him" | | 1 & 9 | complainted that the article and images had misrepresented crime. had not been drinking whilst driving, and he was not employed by Network Rail. | The article was amended. |

EDITORS' CODE OF PRACTICE
INTERNAL COMPLAINTS

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|---------------------------|----------|---|--|-------|---|--|
| Express Website | 12/10/15 | "UKIP fury as Labour and Lib Dems claim Union flag is nasty and nationalistic" | | 1 | It was factually incorrect that any Labour or Liberal Democrat member on Calderdale Council called the Union Flag nasty. The source was a UK MEP who was not at the meeting. | The article was amended to include [redacted] response. |
| Daily Express | 7/10/15 | "Tories cheer May's pledge to kick out bogus refugees" | | 1 | The article referred to "bogus refugees" which is inaccurate. | A correction was published. |
| Express Website | 22/10/15 | "SNP in YES vote funding probe: First Ministers husband centre of 'serious allegation'. | | 2 | [redacted] requested a Right to Reply pursuant to Clause 2, as [redacted] were not asked to comment. Had they been, they would have strenuously denied the allegations. | The article was amended to include [redacted] response. |
| Express Website | 10/11/15 | "Could holidays to Sharm-el-Sheikh be cancelled until next July" | | 1 & 5 | It was inaccurate to report that there were no tourists in Sharm-el-Sheikh and the pictures that were used to illustrate the article were taken in empty parts of the resort. | Thousands of people had been evacuated from the area and Egypt's tourism minister confirmed that there had been a loss of visitors. It was not inaccurate. Clause 5 did not apply to this complaint. |
| Daily Express and Website | 9/10/15 | "Alan's tip of the day" | | 1 | [redacted] complained that Alan Titchmarsh's tip of the day was encouraging illegal activity. The Titchmarsh tip was to catch rats and mice in an humane traps and then release them a long way away. [redacted] said that it was illegal to do this. | The Prevention of Damage by Pests Act only applies to Local Authorities and the Wildlife and Countryside Act makes it an offence to release black rats, which are quite rare. The tip was not inaccurate or illegal. |
| Daily Express | 10/11/15 | "Grief for vibrant girl killed in whale-watch horror" | | 1 | [redacted] complained that [redacted] had been referred to as [redacted] when [redacted] was in fact the [redacted]. [redacted] also said [redacted] wanted to be left in peace. | The online article was amended. |

EDITORS' CODE OF PRACTICE - INTERNAL COMPLAINTS

| Publication | Date Complaint Received | Title of Article | Date of Article | Complainant | Clause Relied Upon | Details of Complaint | Action Taken |
|-------------|-------------------------|---|--------------------------|--|---------------------|--|---|
| new! | 03.03.15 | Picture of Lily Allen in "Papped" Section | 07.03.15 (off sale date) | [REDACTED] | ? | Caption commenting on Ms Allen's "unusually round tum" insinuating she is fat. | Editor replied accepting that this was an unnecessary comment on Ms Allen's figure. Resolved. |
| new! | 13.10.15 | Picture of Simon Cowell with fan in "Papped" Section | 12.10.15 (off sale date) | [REDACTED] | ? | [REDACTED] objected to the caption that Simon Cowell got "more than he bargained for" implied she was a "nut job". | Editor replied that she disagreed with the [REDACTED] interpretation. Mr Cowell is pretending to look shocked in the picture and the copy made it clear that he was happy to pose with her. |
| OK! | 25.10.15 | Interview with Caroline Flack about her autobiography | 27.10.15 (off sale date) | [REDACTED] | 12 – Discrimination | Complainant felt there was a flippant reference to Ms Flack's stalker having schizophrenia. | Editor replied explaining the reference and apologising for any offence. Resolved. |
| OK! | 26.11.15 | Picture of the [REDACTED] [REDACTED] [REDACTED] | 01.12.15 (off sale date) | [REDACTED] [REDACTED] [REDACTED] | 3 – Privacy | Photograph taken on private land. | Editor apologised confirming action had been taken to prevent any further breach. |